

## UNITED STATES DISTRICT COURT

for the

District of South Carolina

In the Matter of the Seizure of  
 (Briefly describe the property to be seized)  
 All contents of PNC Bank account 1251883287

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Case No.

6:24cr956

**APPLICATION FOR A WARRANT  
 TO SEIZE PROPERTY SUBJECT TO FORFEITURE**

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the \_\_\_\_\_ District of \_\_\_\_\_ South Carolina is subject to forfeiture to the United States of America under \_\_\_\_\_ 18 \_\_\_\_\_ U.S.C. §

981, 982 (describe the property):

PNC Bank account 1251883287 or funds held in suspense due to account closure under the business name PERAST FUND LLC, and or signers NATHALYA H VELASQUEZ, and MIGUEL E ORTIZ TORRES.

The application is based on these facts:  
 See attached affidavit.

☒ Continued on the attached sheet.

David Paramore

Applicant's signature

USSS T.F.O. David Paramore

Printed name and title

Sworn to before me and signed in my presence.

by telephone 9:59 a.m.

Date: 10/25/2024

City and state: Greenville, SC 29601



Judge's signature

US Magistrate Kevin F. McDonald

Printed name and title

**AFFIDAVIT**

I, David R. Paramore, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a Task Force Officer with United States Secret Service South Carolina Cyber Fraud Task Force ("USSS SC CFTF") and have been so employed since January 2022. I am currently assigned to the Greenville Residence Office to perform duties as a Task Force Officer (TFO) and investigate financial crimes to include wire fraud, identity theft, credit card fraud, bank fraud, crypto-currency fraud, and money laundering. I am currently employed at the city of Greenville Police Department and have been so employed since June, 2009. I am currently assigned to the Criminal Investigations Division since June, 2017, under the Economic Crimes Unit. As an Economic Crimes Detective, I have received training at the South Carolina Criminal Justice Academy. This training covered aspects of criminal investigation and law enforcement. I have participated in numerous investigations of violations of criminal law including matters involving fraud and white-collar crimes. I have attended numerous training courses involving financial related crimes and crimes involving cryptocurrency.

**II. PURPOSE OF AFFIDAVIT**

2. This affidavit is made in support of an application for a warrant to seize the following (the "Subject Funds"):

Any and all United States Currency in the suspect's PNC Chase Account # 1251883287 (the "Subject Account"), and under the business name PERAST FUND LLC, and account holders NATHALYA H VELASQUEZ (VELASQUEZ), and MIGUEL E ORTIZ TORRES (TORRES).

1           3. As described more fully below, there is probable cause to  
2 believe that the Subject Funds represent the proceeds of one of more  
3 violations of 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 1956 (Money  
4 Laundering), or a conspiracy to commit the same, (the "Subject  
5 Offenses"), committed by unknown persons and transferred into the  
6 Perast Fund LLC account and are therefore subject to seizure pursuant  
7 to 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C. §  
8 981(a)(1)(A) & (C).

9           4. In addition, there is probable cause to believe that the  
10 Subject Funds are subject to seizure and forfeiture to the United  
11 States pursuant to 18 U.S.C. § 982 and 21 U.S.C. § 853(f) because the  
12 property would, in the event of conviction on the alleged underlying  
13 offenses, be subject to forfeiture, and an order under section 21  
14 U.S.C. § 853(e) would not be sufficient to assure the availability of  
15 the property for forfeiture.

16           5. The facts set forth in this affidavit are based upon my  
17 personal observations, my training and experience, bank  
18 investigators, and information obtained from various law enforcement  
19 personnel and witnesses. This affidavit is intended to show merely  
20 that there is sufficient probable cause for the requested warrants  
21 and does not purport to set forth all of my knowledge of, or  
22 investigation into, this matter.

23           6. Unless specifically indicated otherwise, all conversations  
24 and statements described in this affidavit are related in substance  
25 and in part only, and all dates and amounts are approximations.

26                   **III. SUMMARY OF PROBABLE CAUSE**

27           7. USSS and local law enforcement agencies are investigating  
28 an unknown international criminal organization, who through means of

1 a cyber scheme received proceeds from a Business Email Compromise  
2 (BEC) fraud scheme with the intent of obscuring the nature, origin,  
3 and ownership of the funds.

4 8. As set forth below, the Subject Account was used by the  
5 suspect to receive the proceeds of the above-described scheme.  
6 Investigating agents believe that the Subject Account was used to  
7 receive the deposited funds that were obtained through fraud. The  
8 bank's fraud investigators identified the account holding the  
9 victim's funds as likely engaged in fraudulent activity and placed a  
10 hold on the account. Therefore, there is probable cause to believe  
11 that the Subject Funds are subject to seizure and forfeiture by the  
12 United States.

13 **IV. STATEMENT OF PROBABLE CAUSE**

14 9. Based on witness interviews, documents obtained from third  
15 parties, reports of interviews conducted by other law enforcement  
16 officers, conversations with other law enforcement officers, and  
17 publicly filed documents, I know the following:

18 **A. Background on Business Email Compromise Schemes**

19 Often in Business Email Compromise schemes, the victim's own  
20 email is compromised and the scammers interject themselves into what  
21 is often a business transaction. At the opportune time, they provide  
22 payment information, often in an altered invoice, to have the  
23 unwitting victim wire funds directly to the scammer or some other  
24 laundering account. In doing so, the victim believes the funds were  
25 sent to the correct person and it is often not discovered until  
26 enough time has passed to allow the suspect to withdraw the funds.



1           **B.     Theft and Business Email Compromise Scheme from G.N.**

2           10. Based on conversations, emails and documents received  
3 during this investigation, I learned the following:

4           a. On or about January 5, 2024, G.N. a resident of  
5 Easley, SC began correspondence through email with a closing agent  
6 regarding the purchase of a yacht from an online listing. The  
7 victim's email address used in correspondence is  
8 bennett@nalleyproperties.com. The email addresses of the closing  
9 agents provided to the victim were jdouglas@unitedyahct.com and  
10 kathy@unitedyahctsales.com. G.N. began communicating with someone  
11 who was purporting to be the closing agent with United Yacht  
12 Brokerage. Communication occurred over multiple email chains between  
13 G.N. and who he thought was the closing agent. At this time, the  
14 illicit actors posing as the closing agent began to convince G.N.  
15 that he would need to wire the funds based on the instructions  
16 provided, in the amount of \$303,325.00. G.N. traveled to his local  
17 branch and made a wire transfer from his two Wells Fargo accounts  
18 #30979281 and #37598596, which resulted in the fraudulent transfer of  
19 approximately \$606,650.00 (split equally into two wire transfers) on  
20 August 15, 2024 to Truist account #1440018025936. The scammers then  
21 made a wire transfer in the amount of \$320,000.00 into a PNC Bank  
22 account between 08/16/2024 and 08/22/2024. An attorney representing  
23 the victim, contacted the United States Secret Service Greenville  
24 Resident Office to report that his client (G.N.) had fallen prey to a  
25 business email compromise and provided supporting documents.

26           b. The remaining funds, approximately \$20,000.00 in the  
27 PNC Bank account, were frozen by the bank representative due to  
28 suspected fraud. A further check into financial system, identified

1 that the Subject Account and account holder are subject to numerous  
2 other bank reporting documentation.

3 c. PNC Bank has informed law enforcement that account  
4 #1251883287 remains on hold to date.

5  
6 **C. Subject Accounts / Subject Funds**

7 11. G.N. was instructed to send a wire transfer to Truist  
8 Financial account #1440018025936. The funds were then transferred  
9 through domestic wire to PNC Bank account #1251883287. I reviewed  
10 the records for PNC Bank account #1251883287, belonging to PERAST  
11 FUND LLC, and signers NATHALYA H VELASQUEZ, and MIGUEL E ORTIZ  
12 TORRES. The activity in the account appears to be suspicious in  
13 nature, with funds being wired in and almost immediately wired out,  
14 or otherwise withdrawn. No other source of funding appears to occur  
15 in the account during this time period.

16  
17 **V. CONCLUSION**

18 12. Based on the facts set forth above, there is probable cause  
19 to believe that the Subject Funds are subject to seizure pursuant to  
20 18 U.S.C. § 981(b) and forfeiture pursuant to 18 U.S.C.  
21 § 981(a)(1)(C) (rendering subject to forfeiture any property that  
22 constitutes or is derived from proceeds traceable to a violation of  
23 18 U.S.C. § 1343), and § 982 (criminal forfeiture).

24 13. Based on my training and experience, I know that  
25 restraining orders served on banks sometimes fail to preserve the  
26 property for forfeiture because the bank representative receiving the  
27 restraining order fails to put the necessary safeguards in place to  
28 freeze the money in time to prevent the account holder from accessing

1 the funds electronically, or fails to notify the proper personnel as  
2 to the existence of the order, or the bank exercises its own right of  
3 setoff to satisfy an outstanding debt owed to the bank by the account  
4 holder. In contrast, where electronic funds are concerned, a seizure  
5 warrant guarantees that the funds will be in the Government=s custody  
6 once the warrant is served.

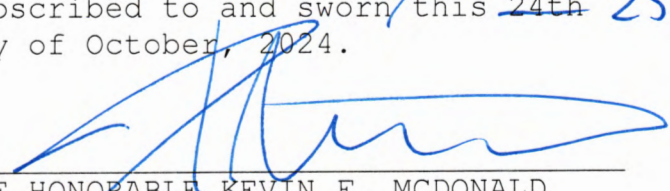
7 14. This affidavit has been reviewed by Assistant U.S. Attorney  
8 Carrie Fisher Sherard.

9 David R. Paramore

10 Attested to by the applicant in  
11 accordance with the requirements of  
12 Fed. R. Crim. P. 4.1

13 David R. Paramore  
14 USSS Task Force Officer

15 Subscribed to and sworn <sup>by telephone</sup> this ~~24th~~ 25th  
16 day of October, 2024.

17   
18 THE HONORABLE KEVIN F. MCDONALD  
19 UNITED STATES MAGISTRATE JUDGE  
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